



ANDREWS ENVIRONMENTAL ENGINEERING INC. 3535 Mayflower Blvd., Springfield, Illinois 62707/(217) 787-2334

July 23, 1999

John D. Lichty
Plant Operations Manager
NRG Technologies, Inc.
8403 Lindenwood Road
Rockford, Illinois 61109



re: Special Waste Stream Review
Pagel Landfill

Illinois Environmental Protection Agency
Non-Hazardous Contaminated Soil
#90-114S/0057

Dear Mr. Lichty:

The Illinois Environmental Protection Agency is requesting the disposal of contaminated soil generated from a facility located in Belvidere. The analysis dated July 22, 1999 from First Environmental Laboratories, Inc. shows the required parameters below hazardous limits. There are no problems indicated by this analysis.

The incorrect IEPA Generator Code is given on the application. The correct code is a ten-digit number that for Boone County would start with 007. It is very possible the first two zeroes are missing from the given number.

Based upon the submitted paperwork, the waste is acceptable under Permit No. 1994-547-LFM as a special waste. The analysis is valid for five years, expiring in June 2004.

If you have any questions regarding this review, please give me a call. Thank you.

Sincerely,

Barry S. Schwalbe
Chemist

BSS:bs:dkr

210-114S/0057-EPA-BEL.DOC

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WINNEBAGO RECLAMATION SERVICES

ADMINISTRATIVE OFFICE

8403 Lindenwood Road • Rockford, IL 61109 • 815-874-4808 • 815-874-4630 FAX

Form 1-SWP

SPECIAL WASTE PROFILE SHEET

Waste Stream Number (N/A if new application) _____

I. WASTE GENERATOR INFORMATION

1. Generator Name Illinois Environmental Protection Agency

2. Site Information
Address 424 Fairview Blvd County Boone
City Belvidere State IL Zip 61008

3. Mailing Information
(if different) Address 8443 Keystone Crossing Suite 103 County _____
City Indianapolis State Indiana Zip 46240

4. Generator IEPA Code 70050017 5. Generator SIC Code _____

6. Generator Contact Name John Grabs

7. Contact Telephone Number 1-317-722-0870

II. TRANSPORTER INFORMATION

1. Method of Shipment (circle) ☒ Bulk Solid ☐ Bulk Liquid ☐ Bulk Sludge ☐ Other _____

2. Transport Frequency (circle)
One Time ☒ Daily ☐ Weekly ☐ Bi-Weekly
Monthly ☐ Bimonthly ☐ Quarterly ☐ Semi-Annually

3. Transporter(s)

a. Name Rockford Blacktop
Telephone Number 634-4700

b. Name Kasper trucking
Telephone Number 756-3331

c. Name _____
Telephone Number _____

III. PHYSICAL CHARACTERISTICS OF WASTE

1. Waste Name Contaminated Soil

2. Process/Operation Name Land Application of waste

3. Process Description Waste consisted of bronze, brass, and nickel sludge

4. Special Handling Instructions (if any) None

5. Color brown 6. Odor none

7. Waste Phase (circle) ☒ Solid ☐ Semi-solid ☐ Liquid ☐ Gas ☐ Powder 8. Percent Solids 86.94

9. Flash Point >212°F 10. pH 8.65 11. Free Liquids (Y/N) N

Form 1a

SPECIAL WASTE RECERTIFICATION

Waste Stream Authorization No _____

Manifest Number _____

Generator Name: Illinois Environmental Protection AgencySite Address: 424 Fairview Blvd.
Belvidere, IL 61008Waste Name: Contaminated Soil**Check Section I or II Below -**

- I. _____ There has been a change in the characteristics of the special waste stream due to one of the following:

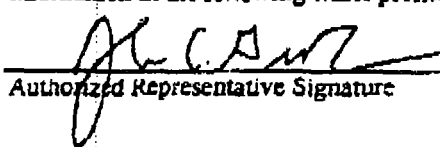
- a) change of a raw material used in the waste generating process;
- b) change in the waste-generating process itself;
- c) change in a physical characteristic of the special waste; and/or
- d) new information has been documented concerning the human health effects of exposure to the special waste

If any of these changes have occurred, a new laboratory analysis and profile sheet is to be completed. Attach copies of the new chemical analysis and a new profile sheet with the appropriate signature.

- II. X There have been no changes that would alter the physical or hazardous characteristics of the special waste stream.

Attach a copy of the original waste profile sheet.

I hereby certify, to the best of my knowledge, that the information contained in this certification and the information in the following waste profile sheet is entirely true and correct.


Authorized Representative Signature

Date

7-22-99John Grabs
Authorized Representative Printed NameTetra Tech EM Inc. for IL Environmental Protection Agency
Title

III. PHYSICAL CHARACTERISTICS OF WASTE (continued)

12. Waste Composition

Major Components	Percent
Contaminated Soil	100%
Total	100%

IV. CHEMICAL CHARACTERISTICS OF WASTE (all may not be required)

1. Metal Concentrations (given in ppm or mg/L)

	TOTAL	TCLP	Limit
Arsenic		<u>20.002</u>	5.0
Barium		<u>21.0</u>	100.0
Cadmium		<u>20.001</u>	1.0
Chromium		<u>20.001</u>	5.0
Lead		<u>20.002</u>	5.0
Mercury		<u>20.0005</u>	0.2
Selenium		<u>0.004</u>	1.0
Silver		<u>20.001</u>	5.0

3. Miscellaneous Parameters (given in ppm or mg/L)

Cyanide			
Total	<u>0.12</u>	10.0	
Reactive	<u>210</u>	10.0	

Sulfide			
Total	<u>2.4</u>	10.0	
Reactive	<u>210</u>	10.0	

Phenol	<u>22.5</u>	1,000.0	
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EOX	<u>38.3</u>	1,000.0	
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PCBs SEE ANALYTICAL
(ALL BELOW MINIMUM DETECTION LIMITS)

4. RCRA Pesticides/Herbicides (given in ppm or mg/L)

Chlordane	<u>20.005</u>	0.030
Heptachlor	<u>20.005</u>	0.0080
Methoxychlor	<u>20.005</u>	10.0
2,4-D	<u>20.0012</u>	10.0

2. Organic Concentrations (given in ppm or mg/L)

	TOTAL	TCLP	Limit
Benzene		<u>20.05</u>	0.50
Carbon Tetrachloride		<u>20.05</u>	0.50
Chlorobenzene		<u>20.05</u>	100.0
Chloroform		<u>20.05</u>	6.0
Cresol		<u>20.1</u>	200.0
1,4-Dichlorobenzene		<u>20.1</u>	7.50
1,2-Dichloroethane		<u>20.05</u>	0.50
1,1-Dichloroethene		<u>20.05</u>	0.70
2,4-Dinitrotoluene		<u>20.1</u>	0.130
Hexachlorobenzene		<u>20.1</u>	0.130
Hexachlorobutadiene		<u>20.1</u>	0.50
Hexachloroethane		<u>20.1</u>	1.0
2-Butanone (MEK)		<u>20.1</u>	200.0
Nitrobenzene		<u>20.1</u>	2.0
Pentachlorophenol		<u>20.5</u>	100.0
Pyridine		<u>20.5</u>	5.0
Tetrachloroethene		<u>20.05</u>	0.70
Trichloroethene		<u>20.05</u>	0.50
2,4,5-Trichlorophenol		<u>20.1</u>	400.0
2,4,6-Trichlorophenol		<u>20.1</u>	2.0
Vinyl chloride		<u>20.1</u>	0.20

Endrin	<u>20.001</u>	0.020
Lindane (gamma-BHC)	<u>20.005</u>	0.40
Toxaphene	<u>20.01</u>	0.50
2,4,5-TP (Silvex)	<u>20.0017</u>	1.0

IV. CHEMICAL CHARACTERISTICS OF WASTE (continued)

5. Hazardous Substances (circle Y/N)

N

Does this waste stream contain any of the following:

- | | | | |
|----|------------------------|---|----------|
| a. | Listed Hazardous Waste | Y | <u>N</u> |
| b. | PCBs | Y | <u>N</u> |
| c. | Dioxins | Y | <u>N</u> |
| d. | Organic Solvents | Y | <u>N</u> |
| e. | Pathogens | Y | <u>N</u> |
| f. | Biological Materials | Y | <u>N</u> |
| g. | Radioactive Materials | Y | <u>N</u> |

V. LIST OF ATTACHMENTS (all may not be required; see Section VI)

<u> </u>	Form 1-a:	Generator Recertification Form	<u>X</u>	<u> </u>	Form 4:	RCRA Pesticide/Herbicide Certification
<u>X</u>	Form 2:	Representative Sample Certification	<u>X</u>	<u> </u>	Form 5:	Cyanide/Sulfide Certification
<u>X</u>	Form 3:	Non-Hazardous Waste Certification	<u>X</u>	<u> </u>	Form 6:	PCB/Phenol/Solvents Waste Certification

Other: _____

VI. EXCEPTIONS

- The generator may certify that the eight pesticides would not reasonably be expected to be present in their waste. By the completion of Form 4, the generator would not have to analyze for the constituents in Section IV.4.
- Petroleum contaminated media and debris from LUST sizes are temporarily exempt from full TCLP analysis. Required parameters are based upon the petroleum contamination.
- Form 5: Cyanide/Sulfide Certification needs to be completed only if cyanide and/or sulfide is tested and detected above 10.0 ppm.
- Form 6: PCB/Phenol/Solvents Waste Certification needs to be completed only if deemed necessary in the review process.

VII. GENERATOR CERTIFICATION

I hereby certify, under penalty of law, that the above and attached information is complete and accurate to the best of my knowledge, that no deliberate or willful emissions of composition or properties exist, and that all known or suspected hazards have been disclosed. This waste does not contain any hazardous wastes as defined in 35 IAC 721 and 40 CFR 261, does not contain medical or infectious waste, does not contain any PCBs as requested under TSCA (40 CFR 761), and does not contain any 2,3,7,8-Tetrachlorodibenodioxin (2,3,7,8 TCDD) or any other dioxin.

Signature

John Graba

Name (Type or Print)

Date

Tetra Tech EM Inc. for Illinois Environmental Protection Agency

Title

• REPRESENTATIVE SAMPLE CERTIFICATION •

THIS CERTIFICATION SHOULD BE COMPLETED IN ITS ENTIRETY BY THE INDIVIDUAL OBTAINING THE SAMPLE FOR DISPOSAL.

Generator's Name: Illinois Environmental Protection Agency
Generator's Address: 424 Fairview Avenue
Belvidere, Illinois 61008

Contact Name: Lynne M. Paulli
Telephone Number: (815) 654-4726

NAME OF WASTE: Contaminated Soil

Date Sampled: 7/20/99

Type of Waste (circle):

<input checked="" type="checkbox"/> Solid	<input type="checkbox"/> Sludge	<input type="checkbox"/> Liquid	<input type="checkbox"/> Other
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Composite Samples:

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Comments (if any):

I CERTIFY TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE SAMPLE DESCRIBED ABOVE IS REPRESENTATIVE OF THE WASTE TO BE MANAGED.

Lynne M. Paulli
(Printed or Typed Name)

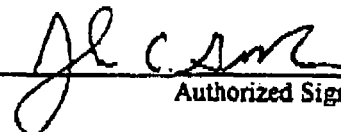
 7-22-99
(Authorized Signature, Date)

Project Manager
(Title)

Environmental Contractors of Illinois, Inc.
(Company)

NON-HAZARDOUS WASTE CERTIFICATIONGENERATORS NAME: Illinois Environmental Protection AgencyGENERATORS ADDRESS: 424 Fairview Blvd
Belvidere, IL 61008NAME OF WASTE: Contaminated Soil

I hereby certify that the waste identified above does not contain or has not come into contact with any hazardous waste listed in 40 CFR Section 261.30 - 261.33 and 35 IL Adm. Code 721.130 - 721.133 and is non-hazardous according to 40 CFR 261.1 - 261.20 and 35 IL Adm. Code 721.101 - 721.133.

John Grabs
(Authorized Representative)
Authorized SignatureTetra Tech EM Inc. for IL Environmental Protection Agency
Title7-22-99
Date

R C R A

• PESTICIDE/HERBICIDE CERTIFICATION •GENERATORS NAME: Illinois Environmental Protection AgencyGENERATORS ADDRESS: 424 Fairview Blvd.Belvidere, IL 61108NAME OF WASTE: Contaminated Soil

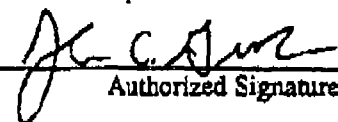
I HEREBY CERTIFY THAT NONE OF THE FOLLOWING RCRA PESTICIDES AND/OR HERBICIDES LISTED BELOW WERE USED IN THE GENERATING PROCESSES INVOLVED IN THE PRODUCTION OF THE WASTE IDENTIFIED ABOVE AND, TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE WASTE DOES NOT CONTAIN HAZARDOUS CONCENTRATIONS OF THESE SUBSTANCES.

Endrin
Methoxychlor
Lindane
Chlordane

Toxaphene
2,4-D
2,4,5-TP Silvex
Heptachlor and its epoxide

John Grabs

(Authorized Representative-Printed or Typed)

X 
Authorized Signature

Tetra Tech EM Inc for IL Environmental Protection Agency

Title

7-22-99

Date

SULFIDE/CYANIDE CERTIFICATION

For wastes containing greater than 10 ppm reactive cyanide or reactive sulfide, the Generator is required to provide a signed and dated statement indicating that none of the following have occurred:

- | | YES | NO |
|---|-------|----------------|
| 1) The waste has caused injury to a worker because of H ₂ S or HCN generation; | _____ | <u>X</u> _____ |
| 2) That the OSHA work place air concentration limits for H ₂ S and/or HCN have been exceeded in areas where the waste is generated, stored or otherwise handled, and | _____ | <u>X</u> _____ |
| 3) That air concentrations of H ₂ S and/or HCN, above few ppm, have been encountered in areas where the waste is generated, stored or otherwise handled. | _____ | <u>X</u> _____ |

GENERATORS NAME: Illinois Environmental Protection Agency

WASTE NAME: Contaminated Soil

Signed: _____

John C. Grabs
Authorized Representative

John Grabs

Tetra Tech EM Inc. for IL Environmental Protection Agency

Printed Name and Title

7-22-99

Date

Form 6

• PHENOL/PCB/SOLVENT WASTE CERTIFICATION •

GENERATOR NAME: Illinois Environmental Protection Agency

SITE ADDRESS: 424 Fairview Blvd
Belvidere, IL 61008

MAILING ADDRESS: c/o Tetra Tech EM Inc.
(if different) 8445 Keystone Crossing Suite 105
Indianapolis, Indiana 46240

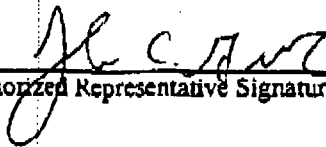
WASTE NAME: Contaminated Soil

I hereby certify that none of the following chemicals listed below were used in the generating processes involved in the production of the waste identified above and, to the best of my knowledge and belief, the waste does not contain hazardous concentrations of these substances.

Phenol

Polychlorinated Biphenyls (PCBs)

RCRA F-Listed Solvents


Authorized Representative Signature

Date

7-22-99

John Grabs
Authorized Representative Printed Name

Tetra Tech EM Inc. for IL Environmental Protection Agency
Title